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	1	DISTRICT COURT	
9	DISTRICT	OF NEVADA	
10			
11	RUTH QUIMBY,	Case No.: 2:19-cv-02181-JCM-NJK	
12	Plaintiff,		
13	vs.	JOINT PRE-TRIAL ORDER	
14	MICHAEL STEVENS, individually;		
15	PINNACLE HEAVY HAUL INC., an Indiana Corporation: DOES Lthrough V. inclusives and		
16	Corporation; DOES I through X, inclusive; and ROE CORPORATIONS I through X, inclusive,		
17	, and the second		
	Defendants.		
18	After protein progradings in this case		
19	After pretrial proceedings in this case,		
20	IT IS ORDERED:		
21	I. INTRODUCTION		
22	1. This is a motor vehicle incident case that occurred on or about November 16, 2017.		
23	Plaintiff alleges Defendant MICHAEL STEVENS was driving a vehicle owned by Defendant		
24	PINNACLE HEAVY HAUL. Based upon info	ormation and belief, at the time of the car crash,	
25	-		
26	Defendant was acting within the course and sco	ope of his employment. Plaintiff and Defendant	
27	were traveling east on SR 17, at the Northbound/	Sunset Road off Ramp. Plaintiff was allegedly in	
28	the Number one (1) left turn lane. Defendant wa	as allegedly in the Number two (2) left turn lane.	

As Defendant attempted to pass Plaintiff, Defendant allegedly failed to maintain his travel lane and struck the left side of Plaintiff's vehicle. Defendant has offered additional affirmative defenses as part of its pleadings in this action, and Defendant reserves the right to rely on the pleadings on file in this action to articulate its contentions in this case.

II. STATEMENT OF JURISDICTION:

This action was originated by the filing of a Complaint in the District Court, Clark County, Nevada on September 11, 2019. Defendants Answered the Complaint on October 30, 2019 and removed the case from State Court to Federal Court on December 18, 2019, citing diversity between the parties and that this Court has jurisdiction of the matter under 28 U.S.C. § 1332 and 28 U.S.C § 1446(d).

- 1. The following facts are admitted by the parties and require no proof: None at this time.
- 2. The following facts are admitted by the parties and require no proof: None at this time.
- 3. The following are issues of fact to be tried and determined at trial:

PLAINTIFF:

- 1. Whether Defendant breached a duty of care owed to Plaintiff.
- 2. The nature, extent and value of Plaintiff's accident-related damages.

DEFENDANT:

- 1. Whether Defendant was negligent at the time of the incident which forms the basis of this litigation.
- 2. Whether Defendant Michael Stevens was negligent in the operation of his motor vehicle at the time of the incident which forms the basis of this litigation.
- Whether such negligence, if any, was a proximate cause of Plaintiff
 RUTH QUIMBY alleged injuries.
- 4. Whether Plaintiff RUTH QUIMBY was comparatively negligent at the time of the incident which forms the basis of this litigation.

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1	5.	Whether the comparative negligence of Plaintiff RUTH QUIMBY, if any,
2		was a proximate cause of Plaintiff RUTH QUIMBY'S alleged injuries and
3		damages.
4	6.	Whether the comparative negligence of Plaintiff RUTH QUIMBY, if any, is
5		greater than the negligence of the Defendant, if any.
6 7	7.	Whether Plaintiff RUTH QUIMBY expressly assumed whatever risk or
8		hazard existed at the time of the alleged incident, if any.
9	8.	Whether Plaintiff RUTH QUIMBY, by assuming the risk or hazard that existed
10		at the time of the alleged incident, if any, was therefore responsible for the
11		alleged injuries suffered, if any.
12	9.	Whether Plaintiff RUTH QUIMBY was involved in a prior accident or other form
13		of traumatic event.
14 15	10.	Whether any prior accident or other form of traumatic event involving Plaintiff
16		RUTH QUIMBY, if any, caused the injuries of which he complains in this
17		litigation.
18	11.	Whether the occurrence which is the subject matter of this action was avoidable.
19	12.	Whether the occurrence which is the subject matter of this action was unavoidable
20	13.	Whether the occurrence which is the subject matter of this action was caused in
21		whole or in part by the actions of a third party, outside of the control of any party
22 23		to this litigation.
24	14.	Whether the occurrence which is the subject matter of this action was caused in
25		whole or in part by the negligence of a third party, outside of the control of any
26		party to this litigation.
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1	15.	The percentage of reduction for the amount of damages that is
2		commensurate with the comparative negligence, in any, of Plaintiff RUTH
3		QUIMBY.
4	16.	Whether Plaintiff RUTH QUIMBY suffered injuries to her head, neck, back,
5		spine or upper and/or lower extremities or any parts of her body in which she
6		claims injury resulting from the incident which forms the basis of this litigation.
7	17.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of past
8	17.	whether I failthful Re III Quilvib I suffered monetary damages in the form of past
9		medical expenses stemming from injuries resulting from the incident which forms
10		the basis of this litigation.
11	18.	The amount of monetary damages in the form of past medical expenses, if
12		any, Plaintiff RUTH QUIMBY suffered from injuries as a proximate result
13		
14		of this accident.
15	19.	Whether Plaintiff RUTH QUIMBY will continue to suffer monetary damages in
16		the future in the form of medical expenses stemming from injuries resulting from
17		the incident which forms the basis of this litigation.
18	20.	The amount of monetary damages in the form of future medical expenses, if
19		any, Plaintiff RUTH QUIMBY will suffer from injuries as a proximate result
20		
21		of this accident.
22	21.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
23		past lost wages stemming from injuries resulting from the incident which forms
24		the basis of this litigation.
25	22.	The amount of monetary damages in the form of past lost wages, if any, Plaintiff
26		RUTH QUIMBY suffered from injuries as a proximate result of this accident.
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1	23.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form of
2		future lost wages stemming from injuries resulting from the incident which forms
3		the basis of this litigation.
4	24.	The amount of monetary damages in the form of future lost wages, if any,
5		Plaintiff RUTH QUIMBY will suffer from injuries as a proximate result of this
6 7		accident.
8	25.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
9		past loss of enjoyment of life, if any, Plaintiff RUTH QUIMBY suffered from
10		injuries as a proximate result of this accident.
11	26.	The amount of monetary damages in the form of past loss of enjoyment of life,
12		if any, Plaintiff RUTH QUIMBY suffered as a result of injuries as a proximate
13		result of this accident.
14 15	27.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form
16		of future loss of enjoyment of life, if any, Plaintiff RUTH QUIMBY suffered
17		from injuries to his body as a proximate result of this accident.
18	28.	The amount of monetary damages in the form of future loss of enjoyment of
19		life, if any, Plaintiff RUTH QUIMBY will suffer as a result of injuries as a
20		proximate result of this accident.
21	29.	Whether Plaintiff RUTH QUIMBY suffered injuries to her spine resulting from
22 23		the incident which forms the basis of this litigation.
24	30.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
25		past medical expenses stemming from injuries resulting from the incident which
26		forms the basis of this litigation.
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1	31.	The amount of monetary damages in the form of past medical expenses, if
2		any, Plaintiff RUTH QUIMBY suffered from injuries as a proximate result of
3		this accident.
4	32.	Whether Plaintiff RUTH QUIMBY will continue to suffer monetary damages in
5		the future in the form of medical expenses stemming from injuries resulting from
6		the incident which forms the basis of this litigation.
7 8	33.	The amount of monetary damages in the form of future medical expenses, if any,
	33.	
9		Plaintiff RUTH QUIMBY will suffer from injuries to his spine as a proximate
10		result of this accident.
11	34.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
12		past lost wages stemming from injuries to his spine resulting from the incident
13		which forms the basis of this litigation.
14	35.	The amount of monetary damages in the form of past lost wages, if any, Plaintiff
15 16		RUTH QUIMBY suffered from injuries to his spine as a proximate result of this
17		
		accident.
18	36.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form of
19 20		future lost wages stemming from injuries to his spine resulting from the incident
21		which forms the basis of this litigation.
22	37.	The amount of monetary damages in the form of future lost wages, if any,
23		Plaintiff RUTH QUIMBY will suffer from injuries as a proximate result of this
24		accident.
25	38.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
26		
27		past loss of enjoyment of life, if any, Plaintiff RUTH QUIMBY suffered from
28		injuries as a proximate result of this accident.

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1	39.	The amount of monetary damages in the form of past loss of enjoyment of life, if
2		any, Plaintiff RUTH QUIMBY suffered as a result of injuries as a proximate
3		result of this accident.
4	40.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form
5		of future loss of enjoyment of life, if any, Plaintiff suffered from injuries to his
6 7		spine as a proximate result of this accident.
8	41.	The amount of monetary damages in the form of future loss of enjoyment of
9		life, if any, Plaintiff RUTH QUIMBY will suffer as a result of injuries as a
10		proximate result of this accident.
11	42.	Whether Plaintiff RUTH QUIMBY failed to mitigate her damages.
12	43.	Whether Plaintiff RUTH QUIMBY suffered from any pre-existing injuries
13		and problems at the time of the incident which forms the basis of this
14 15		litigation.
16	44.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment derived from
17		unreasonable or unnecessary treatment
18	45.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were usual
19		and customary in the Las Vegas community.
20	46.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were
21		presented solely to improperly attempt to increase the value of this case.
22 23	47.	Whether Plaintiff RUTH QUIMBY's alleged injuries were the result of a
24		superseding intervening cause.
25	48.	Whether Plaintiff RUTH QUIMBY suffered from any pre-existing injuries
26		and problems at the time of the incident which forms the basis of this
27		litigation.
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	49.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment derived from
		unreasonable or unnecessary treatment
	50.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were usual and
		customary in the Las Vegas community.
	51.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were presented
		solely to improperly attempt to increase the value of this case.
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	32.	Whether Defendants were negligent and whether such negligence was a proximate
		cause of Plaintiff RUTH QUIMBY's alleged injuries and alleged damages.
	53.	Whether Plaintiff RUTH QUIMBY was comparatively negligent in causing the
		subject accident.
	54.	Whether the comparative negligence of Plaintiff RUTH QUIMBY, if any, is
		greater than the negligence of the Defendants, if any.
	55	
	33.	The percentage of reduction for the amount of damages that is commensurate with
		the comparative negligence, in any, of Plaintiff RUTH QUIMBY.
	56.	The percentage of reduction for the amount of damages that is commensurate with
		the comparative negligence, in any, of Plaintiff RUTH QUIMBY.
	57.	The percentage of reduction for the amount of damages that is commensurate with
		the comparative negligence, in any, of Plaintiff RUTH QUIMBY.
		the comparative negligenee, in any, of Flaminii Re III Quivib I.
	58.	The extent and value of Plaintiff's damages (including past and future pain and
suffer	ring) rela	ated to the incident, if any, and as permitted by Court orders regarding admissibility.
III.		FOLLOWING ARE ISSUES OF LAW TO BE TRIED AND DETERMINED
	<u>A1 1.</u>	<u>KIAL</u> :
	1.	Duty
	2.	Breach
	3.	Causation
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1	4.	Damages
2	5.	The issues of law raised in the parties' anticipated Motions in Limine.
3	6.	The issues of law raised by the parties at trial.
4	7.	Whether Defendant was negligent at the time of the incident which forms the basis
5		of this litigation.
6	8.	Whether such negligence, if any, was a proximate cause of Plaintiff's alleged
7	0.	
8		injuries and alleged damages.
9	9.	Whether Plaintiff failed to operate her vehicle in a safe and reasonable manner at
10		the time of the subject incident.
11	10.	Whether the subject collision proximately caused injuries to Plaintiff.
12	11.	Whether Plaintiff was comparatively negligent at the time of the incident which
13		forms the basis of this litigation.
14	12.	Whether the comparative negligence of Plaintiff, if any, was a proximate cause of
15	12.	
16		Plaintiff's alleged injuries and alleged damages.
17	13.	Whether the comparative negligence of Plaintiff, if any, is greater than the
18		negligence of the Defendant, if any.
19	14.	Whether any risks and dangers involved in the factual situation set forth in the
20		Complaint, if any, were open and obvious to Plaintiff.
21	15.	Whether Plaintiff was involved in a prior accident or other form of traumatic event.
22		
23	16.	Whether any prior accident or other form of traumatic event involving Plaintiff, if
24		any, caused the injuries of which he complains in this litigation.
25	17.	Whether the occurrence which is the subject matter of this action was avoidable.
26	18.	Whether the occurrence which is the subject matter of this action was unavoidable.
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1	19.	Whether the occurrence which is the subject matter of this action was caused in
2		whole or in part by the actions of a third party, outside of the control of any party
3		to this litigation.
4	20.	Whether the occurrence which is the subject matter of this action was caused in
5		whole or in part by the negligence of a third party, outside of the control of any
6 7		party to this litigation.
8	21.	The percentage of reduction for the amount of damages that is commensurate
9		with the comparative negligence, in any, of Plaintiff.
10	22.	Whether Plaintiff suffered injuries resulting from the incident which forms the
11		basis of this litigation.
12	23.	Whether Plaintiff suffered monetary damages in the form of past medical expenses
13		stemming from alleged injuries resulting from the incident which forms the basis
14 15		of this litigation.
16	24.	The amount of monetary damages in the form of past medical expenses, if any,
17		Plaintiff suffered from alleged injuries as a proximate result of this accident.
18	25.	Whether Plaintiff will continue to suffer monetary damages in the future in the
19		form of medical expenses stemming from alleged injuries resulting from the
20		incident which forms the basis of this litigation.
21		- Company of the Comp
22	26.	The amount of monetary damages in the form of future medical expenses, if
23		any, Plaintiff will suffer from alleged injuries as a proximate result of this
24		accident.
25	27.	Whether Plaintiff suffered monetary damages in the form of past lost wages
26		stemming from injuries resulting from the incident which forms the
27		basis of this litigation.
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- 28. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries as a proximate result of this accident.
- 29. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries resulting from the incident which forms the basis of this litigation.
- 30. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries as a proximate result of this accident.
- 31. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries as a proximate result of this accident.
- 32. The amount of monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered as a result of injuries as a proximate result of this accident.
- 33. Whether Plaintiff will suffer monetary damages in the form of future loss of enjoyment of life, if any, Plaintiff suffered from injuries as a proximate result of this accident.
- 34. The amount of monetary damages in the form of future loss of enjoyment of life, if any, Plaintiff will suffer as a result of injuries as a proximate result of this accident.
- 35. Whether Plaintiff suffered injuries to her body, including, but not limited to her, spine resulting from the incident which forms the basis of this litigation.
- 36. Whether Plaintiff suffered monetary damages in the form of past medical expenses stemming from alleged injuries resulting from the incident which forms the basis of this litigation.

1	37.	The amount of monetary damages in the form of past medical expenses, if
2		any, Plaintiff suffered from alleged injuries as a proximate result of this
3		accident.
4	38.	Whether Plaintiff will continue to suffer monetary damages in the future in the
5		form of medical expenses stemming from injuries allegedly resulting from the
6		incident which forms the basis of this litigation.
7 8	39.	The amount of monetary damages in the form of future medical expenses, if any,
9		Plaintiff will suffer from injuries as a proximate result of this accident.
10	40.	Whether Plaintiff suffered monetary damages in the form of past lost wages
11		stemming from injuries to his spine resulting from the incident which forms the
12		basis of this litigation.
13	41.	The amount of monetary damages in the form of past lost wages, if any, Plaintiff
14		suffered from injuries allegedly as a proximate result of this accident.
15	42.	Whether Plaintiff will suffer monetary damages in the form of future lost wages
16		stemming from injuries allegedly resulting from the incident which forms the basis
17		of this litigation.
18	43.	The amount of monetary damages in the form of future lost wages, if any,
19		Plaintiff will suffer from injuries allegedly as a proximate result of this accident.
20	44.	Whether Plaintiff suffered monetary damages in the form of past loss of
21	44.	·
22		enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate
23	45	result of this accident.
24	45.	The amount of monetary damages in the form of past loss of enjoyment of life, if
25		any, Plaintiff suffered as a result of injuries allegedly as a proximate result of this
26		accident.
27		
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1		46.	Whether Plaintiff will suffer monetary damages in the form of future loss of
2			enjoyment of life, if any, Plaintiff suffered from injuries as a proximate result
3			of this accident.
4		47.	The amount of monetary damages in the form of future loss of enjoyment of
5		47.	
6			life, if any, Plaintiff will suffer as a result of injuries allegedly as a
7			proximate result of this accident.
8		48.	Whether Plaintiff failed to mitigate her damages.
9		49.	Whether Plaintiff suffered from any pre-existing injuries and problems in her
10			body at the time of the incident which forms the basis of this litigation.
11		50.	Whether Plaintiff's medical costs for treatment derived from unreasonable or
12			unnecessary treatment.
13		51.	Whether Plaintiff's medical costs for treatment were usual and customary in the
14			Las Vegas community.
15		52.	Whether Plaintiff's medical costs for treatment were presented solely to
16		im	aproperly attempt to increase the value of this case.
17		53.	Whether Plaintiff's alleged injuries were the result of a superseding intervening
18			cause.
19		54.	Whether Plaintiff suffered from any pre-existing injuries and problems at the time
20			of the incident which forms the basis of this litigation.
21		55.	Such evidentiary and procedural issues which may arise during the trial of this
22			action.
23		56.	Any remaining issues which may be brought before the Court after rulings on
24		20.	
25			Motions in Limine.
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27	///		
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IV. EXHIBITS

(a) The following exhibits are stipulated into evidence in this case and may be so marked by the clerk:

NONE.

(b) As to the following exhibits, the party against whom the same will be offered objects to their admission on the grounds stated:

The following exhibits, though not agreed as admissible evidence in this case, are subject to be used by the parties. The parties will work to refine a list of exhibits.

The Parties intend to offer into evidence in this case the following exhibits:

No.: Plaintiff's Exhibits:

Exhibit	Description	Defendants' Objections
1.	Community Ambulance medical records and billing	
1.	statement.	is/are not genuine or authentic;
	statement.	constitute inadmissible
		hearsay; are unduly
		prejudicial; violative of the
		best evidence rule, are not
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
		limine.
2.	Interventional Pain & Spine Institute medical records	inadmissible, lack foundation,
	and billing statement.	is/are not genuine or authentic;
		constitute inadmissible hearsay;
		are unduly prejudicial; violative
		of the best evidence rule, are not
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are

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1			excluded by any motion in limine.
2	3.	Radiology Specialists FILMS, medical records and	
		billing statement.	is/are not genuine or authentic;
3			constitute inadmissible hearsay;
4			are unduly prejudicial; violative
5			of the best evidence rule, are not relevant, and are inadmissible
6			for any other reason set forth
			within the statutory Rules of Evidence in Nevada, or any
7			other Nevada law. Defendants
8			further object to the extent that
			this/these documents are
9			excluded by any motion in
10		F	limine.
	4.	Fremont Emergency Services billing statement.	inadmissible, lack foundation, is/are not genuine or authentic;
11			constitute inadmissible hearsay;
12			are unduly prejudicial; violative
10			of the best evidence rule, are not
13			relevant, and are inadmissible
14			for any other reason set forth within the statutory Rules of
4.5			Evidence in Nevada, or any
15			other Nevada law. Defendants
16			further object to the extent that
17			this/these documents are
17			excluded by any motion in
18	5.	Las Vegas Radiology FILMS, medical records and	limine. inadmissible, lack foundation,
19] 3.	billing statement.	is/are not genuine or authentic;
			constitute inadmissible hearsay;
20			are unduly prejudicial; violative of the best evidence rule, are not
21			relevant, and are inadmissible
22			for any other reason set forth within the statutory Rules of
23			Evidence in Nevada, or any
			other Nevada law. Defendants
24			further object to the extent that this/these documents are
25			excluded by any motion in
26			limine.
	6.	Machuca Medicine and Machuca Medicine Dispensary medical records and billing	inadmissible, lack foundation,
27		statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
28			are unduly prejudicial; violative

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1			of the best evidence rule, are not relevant, and are inadmissible
2			for any other reason set forth
3			within the statutory Rules of
3			Evidence in Nevada, or any
4			other Nevada law. Defendants
5			further object to the extent that this/these documents are
3			excluded by any motion in
6			limine.
7	7.	Sunrise Hospital medical records and billing	inadmissible, lack foundation,
8		statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
			are unduly prejudicial; violative
9			of the best evidence rule, are not
10			relevant, and are inadmissible for any other reason set forth
11			within the statutory Rules of
10			Evidence in Nevada, or any other Nevada law. Defendants
12			further object to the extent that
13			this/these documents are
14			excluded by any motion in
14			limine.
15	8.	Interventional Pain & Spine Institute Surgical Recommendation letter.	inadmissible, lack foundation, is/are not genuine or authentic;
16		Recommendation letter.	constitute inadmissible hearsay;
			are unduly prejudicial; violative
17			of the best evidence rule, are not
18			relevant, and are inadmissible
			for any other reason set forth within the statutory Rules of
19			Evidence in Nevada, or any
20			other Nevada law. Defendants
21			further object to the extent that
21			this/these documents are excluded by any motion in
22			limine.
23	9.	A&M Chiropractic Wellness Center records and	inadmissible, lack foundation,
24		billing statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
			are unduly prejudicial; violative
25			of the best evidence rule, are not
26			relevant, and are inadmissible
			for any other reason set forth
27			within the statutory Rules of Evidence in Nevada, or any
28			other Nevada law. Defendants

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1			further object to the extent that
2			this/these documents are
2			excluded by any motion in
3	10		limine.
	10.	Spectra Clinical Labs medical records and billing statement.	inadmissible, lack foundation,
4		statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
5			are unduly prejudicial; violative
			of the best evidence rule, are not
6			relevant, and are inadmissible
7			for any other reason set forth
<i>'</i>			within the statutory Rules of
8			Evidence in Nevada, or any
			other Nevada law. Defendants
9			further object to the extent that
10			this/these documents are
			excluded by any motion in limine.
11	11.	New Century Rehabilitation (ATI Physical	inadmissible, lack foundation,
12		Therapy) medical records and billing statement.	is/are not genuine or authentic;
			constitute inadmissible hearsay;
13			are unduly prejudicial; violative
14			of the best evidence rule, are not
17			relevant, and are inadmissible
15			for any other reason set forth
16			within the statutory Rules of
16			Evidence in Nevada, or any other Nevada law. Defendants
17			further object to the extent that
			this/these documents are
18			excluded by any motion in
19			limine.
	12.	Quest Diagnostics medical and billing records.	inadmissible, lack foundation,
20			is/are not genuine or authentic;
21			constitute inadmissible hearsay;
-1			are unduly prejudicial; violative
22			of the best evidence rule, are not relevant, and are inadmissible
23			for any other reason set forth
43			within the statutory Rules of
24			Evidence in Nevada, or any
25			other Nevada law. Defendants
25			further object to the extent that
26			this/these documents are
			excluded by any motion in
27	13.	Concentre Medical Center records and hilling	limine.
28	13.	Concentra Medical Center records and billing statements.	inadmissible, lack foundation, is/are not genuine or authentic;
		succinonts.	15/ are not genuine of authentic,

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1			constitute inadmissible hearsay; are unduly prejudicial; violative
2			of the best evidence rule, are not
3			relevant, and are inadmissible
4			for any other reason set forth within the statutory Rules of
4			Evidence in Nevada, or any other Nevada law. Defendants
5			further object to the extent that
6			this/these documents are
7			excluded by any motion in limine.
8	14.	SimonMed Imaging FILMS, medical records and	inadmissible, lack foundation,
		billing statement.	is/are not genuine or authentic;
9			constitute inadmissible hearsay;
10			are unduly prejudicial; violative of the best evidence rule, are not
11			relevant, and are inadmissible
			for any other reason set forth
12			within the statutory Rules of Evidence in Nevada, or any
13			other Nevada law. Defendants
1.4			further object to the extent that
14			this/these documents are
15			excluded by any motion in limine.
16	15.	Nevada Orthopedic and Spine Center medical	inadmissible, lack foundation,
		records and billing.	is/are not genuine or authentic;
17			constitute inadmissible hearsay;
18			are unduly prejudicial; violative
10			of the best evidence rule, are not relevant, and are inadmissible
19			for any other reason set forth
20			101 any other reason set form
20			within the statutory Rules of
21			within the statutory Rules of Evidence in Nevada, or any
21			within the statutory Rules of
			within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are
21			within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in
21 22	16.	Joseph Schifini, M.D. medical records and billing	within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are
21 22 23 24	16.	Joseph Schifini, M.D. medical records and billing statement.	within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine. inadmissible, lack foundation, is/are not genuine or authentic;
21 22 23	16.		within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine. inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay;
21 22 23 24	16.		within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine. inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay; are unduly prejudicial; violative
21 22 23 24 25 26	16.		within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine. inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay;
21 22 23 24 25	16.		within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine. inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay; are unduly prejudicial; violative of the best evidence rule, are not

1 2			Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that
2			this/these documents are
3			excluded by any motion in
4			limine.
_	17.	RVA Rehabilitation and Vocational Associates	inadmissible, lack foundation,
5 6		medical records and billing statement.	is/are not genuine or authentic; constitute inadmissible hearsay; are unduly prejudicial; violative
7			of the best evidence rule, are not relevant, and are inadmissible
8			for any other reason set forth
9			within the statutory Rules of Evidence in Nevada, or any
10			other Nevada law. Defendants further object to the extent that
11			this/these documents are
12			excluded by any motion in limine.
12	18.	Steinberg Diagnostic medical records and billing	inadmissible, lack foundation,
13		statement.	is/are not genuine or authentic;
14			constitute inadmissible hearsay;
14			are unduly prejudicial; violative
15			of the best evidence rule, are not
16			relevant, and are inadmissible for any other reason set forth
10			within the statutory Rules of
17			Evidence in Nevada, or any
10			other Nevada law. Defendants
18			further object to the extent that
19			this/these documents are
			excluded by any motion in
20	10	Madical Dahahilitatian Associates medical mounds	limine.
21	19.	Medical Rehabilitation Associates medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic;
22		-	constitute inadmissible hearsay;
23			are unduly prejudicial; violative of the best evidence rule, are not
			relevant, and are inadmissible
24			for any other reason set forth within the statutory Rules of
25			Evidence in Nevada, or any
26			other Nevada law. Defendants
27			further object to the extent that this/these documents are
41			excluded by any motion in
28			limine.

1	20.	Nevada Health Center medical records and billing	inadmissible, lack foundation,
2		statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
3			are unduly prejudicial; violative
4			of the best evidence rule, are not relevant, and are inadmissible
5			for any other reason set forth within the statutory Rules of
			Evidence in Nevada, or any
6			other Nevada law. Defendants further object to the extent that
7			this/these documents are
8			excluded by any motion in limine.
9	21	Las Vegas Neuroscience and Pain Medicine	inadmissible, lack foundation,
10		(Mouchir Harb, M.D.) medical and billing records.	is/are not genuine or authentic; constitute inadmissible hearsay;
11			are unduly prejudicial; violative of the best evidence rule, are not
12			relevant, and are inadmissible
13			for any other reason set forth within the statutory Rules of
14			Evidence in Nevada, or any
15			other Nevada law. Defendants further object to the extent that
			this/these documents are
16			excluded by any motion in limine.
17	22.	First Person Care Clinics medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic;
18		Todorus	constitute inadmissible hearsay;
19			are unduly prejudicial; violative of the best evidence rule, are not
20			relevant, and are inadmissible
21			for any other reason set forth within the statutory Rules of
22			Evidence in Nevada, or any other Nevada law. Defendants
23			further object to the extent that
24			this/these documents are excluded by any motion in
25	22	Descrit Dedictory EH MC 1' 1 1 1 1'''	limine.
26	23.	Desert Radiology FILMS, medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic;
			constitute inadmissible hearsay; are unduly prejudicial; violative
27			of the best evidence rule, are not
28			relevant, and are inadmissible

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1			for any other reason set forth
2			within the statutory Rules of
2			Evidence in Nevada, or any other Nevada law. Defendants
3			further object to the extent that
4			this/these documents are
4			excluded by any motion in
5			limine.
6	24.	Henderson Hospital medical and billing records.	inadmissible, lack foundation,
•			is/are not genuine or authentic;
7			constitute inadmissible hearsay; are unduly prejudicial; violative
8			of the best evidence rule, are not
0			relevant, and are inadmissible
9			for any other reason set forth
10			within the statutory Rules of
			Evidence in Nevada, or any other Nevada law. Defendants
11			further object to the extent that
12			this/these documents are
			excluded by any motion in
13			limine.
14	25.	Firooz Mashhood, M.D. medical records and billing	inadmissible, lack foundation,
		statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
15			are unduly prejudicial; violative
16			of the best evidence rule, are not
17			relevant, and are inadmissible
17			for any other reason set forth
18			within the statutory Rules of Evidence in Nevada, or any
19			other Nevada law. Defendants
19			further object to the extent that
20			this/these documents are
21			excluded by any motion in
	26.	Steinberg Diagnostic Medical Imaging FILMS,	limine. inadmissible, lack foundation,
22	20.	medical and billing records.	is/are not genuine or authentic;
23			constitute inadmissible hearsay;
			are unduly prejudicial; violative
24			of the best evidence rule, are not
25			relevant, and are inadmissible for any other reason set forth
26			within the statutory Rules of
26			Evidence in Nevada, or any
27			other Nevada law. Defendants
20			further object to the extent that
28			this/these documents are

1			excluded by any motion in
			limine.
2	27.	Machuca Family medical and billing records.	inadmissible, lack foundation,
3			is/are not genuine or authentic;
_			constitute inadmissible hearsay;
4			are unduly prejudicial; violative of the best evidence rule, are not
5			relevant, and are inadmissible
			for any other reason set forth
6			within the statutory Rules of
7			Evidence in Nevada, or any
			other Nevada law. Defendants
8			further object to the extent that
			this/these documents are
9			excluded by any motion in
10	28.	Kelly Hawkins Physical Therapy medical records	limine. inadmissible, lack foundation,
	20.	and billing statement.	is/are not genuine or authentic;
11		and onling statement.	constitute inadmissible hearsay;
12			are unduly prejudicial; violative
			of the best evidence rule, are not
13			relevant, and are inadmissible
14			for any other reason set forth
			within the statutory Rules of
15			Evidence in Nevada, or any other Nevada law. Defendants
16			further object to the extent that
10			this/these documents are
17			excluded by any motion in
18			limine.
10	29.	UMC medical records and billing statement.	inadmissible, lack foundation,
19			is/are not genuine or authentic;
20			constitute inadmissible hearsay;
20			are unduly prejudicial; violative of the best evidence rule, are not
21			relevant, and are inadmissible
22			for any other reason set forth
22			within the statutory Rules of
23			Evidence in Nevada, or any
			other Nevada law. Defendants
24			further object to the extent that
25			this/these documents are
			excluded by any motion in limine.
26	30.	IME Recording of Dr. Kaplan.	inadmissible, lack foundation,
27		The residence of Dr. Isupuni	is/are not genuine or authentic;
			constitute inadmissible hearsay;
28			are unduly prejudicial; violative

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1			of the best evidence rule, are not
2			relevant, and are inadmissible for any other reason set forth
			within the statutory Rules of
3			Evidence in Nevada, or any
4			other Nevada law. Defendants
- 1			further object to the extent that
5			this/these documents are
6			excluded by any motion in
	31.	PMSI Pharmacy medical records and billing	limine. inadmissible, lack foundation,
7	31.	statement.	is/are not genuine or authentic;
8			constitute inadmissible hearsay;
			are unduly prejudicial; violative
9			of the best evidence rule, are not
10			relevant, and are inadmissible for any other reason set forth
11			within the statutory Rules of
			Evidence in Nevada, or any
12			other Nevada law. Defendants further object to the extent that
13			this/these documents are
			excluded by any motion in
14			limine.
15	32.	Computation of Damages Chart.	inadmissible, lack foundation,
16			is/are not genuine or authentic;
16			constitute inadmissible hearsay; are unduly prejudicial; violative
17			of the best evidence rule, are not
18			relevant, and are inadmissible
10			for any other reason set forth
19			within the statutory Rules of
20			Evidence in Nevada, or any other Nevada law. Defendants
			further object to the extent that
21			this/these documents are
22			excluded by any motion in
	33.	NHP Dash Cam Footage.	limine. inadmissible, lack foundation,
23] 33.	Tim Dasii Caiii I ootage.	is/are not genuine or authentic;
24			constitute inadmissible hearsay;
25			are unduly prejudicial; are not
43			relevant, and are inadmissible
26			for any other reason set forth within the statutory Rules of
27			Evidence in Nevada, Nevada
			case, including but not limited
28			to <i>Frias v. Valle</i> , 101 Nev. 219

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1			(1985) or any other Nevada law.
			Defendants further object to the
2			extent that this/these documents
3			are excluded by any motion in
3			limine.
4	34.	NHP Photos.	inadmissible, lack foundation,
_			is/are not genuine or authentic;
5			constitute inadmissible hearsay;
6			are unduly prejudicial; violative
· ·			of the best evidence rule, are not
7			relevant, and are inadmissible
			for any other reason set forth
8			within the statutory Rules of Evidence in Nevada, or any
9			other Nevada law. Defendants
			further object to the extent that
10			this/these documents are
11			excluded by any motion in
11			limine.
12	35.	One (1) Colored Photograph of Plaintiff's Vehicle.	inadmissible, lack foundation,
			is/are not genuine or authentic;
13			constitute inadmissible hearsay;
14			are unduly prejudicial; violative
14			of the best evidence rule, are not
15			relevant, and are inadmissible
16			for any other reason set forth
16			within the statutory Rules of Evidence in Nevada, or any
17			other Nevada law. Defendants
			further object to the extent that
18			this/these documents are
19			excluded by any motion in
			limine.
20	36.	Traffic Accident Report.	inadmissible, lack foundation,
21			is/are not genuine or authentic;
41			constitute inadmissible hearsay;
22			are unduly prejudicial; are not
			relevant, and are inadmissible
23			for any other reason set forth within the statutory Rules of
24			Evidence in Nevada, Nevada
			case, including but not limited
25			to <i>Frias v. Valle</i> , 101 Nev. 219
26			(1985) or any other Nevada law.
26			Defendants further object to the
27			extent that this/these documents
•			are excluded by any motion in
28			limine.

37.	Eleven (11) Color Photos of both Plaintiff and	inadmissible, lack foundation,
	Defendant's vehicles at the scene of the incident.	is/are not genuine or authentic;
		constitute inadmissible hearsay;
		are unduly prejudicial; violative
		of the best evidence rule, are not
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
		limine.
38.	Thirty-One (31) Color Photos taken by NHP from	inadmissible, lack foundation,
	the scene of the incident.	is/are not genuine or authentic;
		constitute inadmissible hearsay;
		are unduly prejudicial; violative
		of the best evidence rule, are not
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
		limine.

No.: <u>Defendant's Exhibits</u>:

Exhibit	Description	Plaintiff's Objection
1.	Pinnacle Heavy Haul Bill of Lading dated	
	November 14, 2017	
2.	Three (3) color photographs of accident scene	
3.	Driver's Accident Report	
4.	Thirty-two (32) JPG photos from the Nevada	
	Highway Patrol and edited dash cam footage	
5.	Plaintiff Ruth Quimby's Community Ambulance	
	medical and billing records	
6.	Fremont Emergency Services medical and billing	
	records	
7.	Plaintiff Ruth Quimby's Interventional Pain and	
	Spine Institute medical and billing records	
8.	Plaintiff Ruth Quimby's Las Vegas Radiology + films- 01/15/18 MRI Lumbar	
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9.	Plaintiff Ruth Quimby's Machuca Family	
	Medicine medical and billing records	

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1	10.	Plaintiff Ruth Quimby's Radiology Specialists	
	11.	Plaintiff Ruth Quimby's Sunrise Hospital	
2	12.	Vehicle Registration for 2013 Freightliner tractor	
2	13.	Certificate of Vehicle Title for Defendant's 2013	
3		Freightliner tractor	
4	14.	Vehicle Lease Agreement related to 2013	
-		Freightliner tractor/trailer	
5	15.	Michael Stevens' Employment File	inadmissible, lack foundation,
			is/are not genuine or
6			authentic; constitute
7			inadmissible hearsay; are
-			unduly prejudicial; violative
8			of the best evidence rule,
	16.	Plaintiff Ruth Quimby's Las Vegas Surgery Center	
9	17.	Plaintiff Ruth Quimby's Steinberg Diagnostic	
10		Medical Imaging	
10	18.	Plaintiff Ruth Quimby's A&M Chiropractic	
11	19.	Plaintiff Ruth Quimby's medical records, bills	
		and/or films from Las Vegas Radiology	
12	20.	Plaintiff Ruth Quimby's medical records, bills	
13		and/or films from Steinberg Diagnostic Medical	
10		Imaging	
14	21.	Plaintiff Ruth Quimby's medical records, bills	
4.5		and/or films from Quest Diagnostics	
15	22.	Plaintiff Ruth Quimby's medical records, bills	
16	22	and/or films from New Century Rehabilitation	
10	23.	Plaintiff Ruth Quimby's medical records, bills	
17	24	and/or films from Spectra Clinical Labs	
10	24.	Plaintiff Ruth Quimby's medical records, bills and/or films from Nevada Orthopedic and Spine	
18		Center + films	
19	25.	Plaintiff Ruth Quimby's medical records, bills	
	25.	and/or films from Las Vegas Neuroscience and	
20		Pain Management	
21	26.	Plaintiff Ruth Quimby's medical bills received	
41		from Sunrise Hospital	
22	27.	Plaintiff Ruth Quimby's medical bills received	
		from Las Vegas Neuroscience and Pain	
23		Management	
24	28.	Plaintiff Ruth Quimby's medical records received	
4		from PMSI Pharmacy	
25	29.	Plaintiff Ruth Quimby's Employment Records	
		received from the United States Postal Service	
26		[personnel file]	
27	30.	Plaintiff Ruth Quimby's Employment Records	
<i>41</i>		received from the United States Postal Service	
28		[worker's compensation file]	
	31.	Plaintiff Ruth Quimby's Medical and Billing	

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1		Records received from Rehabilitation &	
		Vocational Associates	
2	32.	Certificate of Custodian of Records for Plaintiff's	
2		Ruth Quimby's billing and medical records	
3		received from Quest Diagnostics	
4	33.	Plaintiff Ruth Quimby's Medical and Billing	
-		Records received from Concentra Health	
5	34.	Plaintiff Ruth Quimby's Films received from	
		Sunrise Hospital	
6	35.	Plaintiff Ruth Quimby's Films received from	
7		SimonMed Imaging	
	36.	Plaintiff Ruth Quimby's Medical and Billing	
8		Records received from Firooz Mashhood, M.D.	
9	37.	Plaintiff Ruth Quimby's Medical and Billing	
9		Records received from Henderson Hospital + films	
10	38.	Certificate of Custodian of Records of Plaintiff	
		Ruth Quimby for SimonMed Imaging	
11	39.	Summons and Complaint	
12	40.	Plaintiff Ruth Quimby's Responses to Defendant's	Inadmissible to the extent
14		First Set of Interrogatories, dated October 2, 2020	superseded by supplemental
13		(to the extent deemed admissible by the Court, or	answers.
		for purposes of reference without the intent to admit the document)	
14	41.	Plaintiff Ruth Quimby's Responses to Defendant's	
15	4 1.	First Set of Request for Production of Documents,	
13		dated October 2, 2020	
16		(to the extent deemed admissible by the Court, or	
		for purposes of reference without the intent to	
17		admit the document)	
18	42.	Plaintiff Ruth Quimby's Supplemental Responses	Inadmissible to the extent
10		to Defendant's First Set of Request for Production	superseded by supplemental
19		of Documents, dated October 2, 2020	responses.
20		(to the extent deemed admissible by the Court, or	
20		for purposes of reference without the intent to	
21		admit the document)	
	43.	Plaintiff Ruth Quimby's Responses to Defendant's	
22		Second Set of Interrogatories, dated May 6, 2021	
22		(to the extent deemed admissible by the Court, or	
23		for purposes of reference without the intent to	
24	1.4	admit the document)	
	44.	Plaintiff Ruth Quimby's Errata to her Responses to	
25		Defendant's First Set of Interrogatories, dated May 6, 2021 (to the extent deemed admissible by the	
26		Court, or for purposes of reference without the	
40		intent to admit the document)	
27	45.	Defendant Pinnacle Heavy Haul, Inc. dba Pinnacle	
		Transport Group's Responses to Plaintiff's First	
28		Set of Requests for Admissions, dated September	

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1		18, 2020 (to the extent deemed admissible by the	
_		Court, or for purposes of reference without the	
2		intent to admit the document)	
2	46.	Defendant Pinnacle Heavy Haul, Inc. dba Pinnacle	
3		Transport Group's Responses to Plaintiff's First	
4		Set of Interrogatories, dated September 18, 2020	
-		(to the extent deemed admissible by the Court, or	
5		for purposes of reference without the intent to	
		admit the document)	
6	47.	Defendant Pinnacle Heavy Haul, Inc. dba Pinnacle	
7		Transport Group's Responses to Plaintiff's First	
		Set of Request for Production of Documents, dated	
8		September 18, 2020 (to the extent deemed	
0		admissible by the Court, or for purposes of	
9	10	reference without the intent to admit the document)	
10	48.	Curriculum Vitae of Whitney G. Morgan (to the	inadmissible, lack foundation,
		extent deemed admissible by the Court, or for	is/are not genuine or
11		purposes of reference without the intent to admit the document)	authentic; constitute
12	49.	,	inadmissible hearsay. Constitutes inadmissible
12	49. 	Initial Expert Report of Whitney G. Morgan, dated May 28, 2021	hearsay.
13	50.	Supplemental Expert Report of Whitney G.	Constitutes inadmissible
	50.	Morgan, dated August 10, 2021	hearsay.
14	51.	Initial Expert Report of Dror Kopernik, dated	Constitutes inadmissible
15		August 2, 2021 (to the extent deemed admissible	hearsay.
13		by the Court, or for purposes of reference without	noursay.
16		the intent to admit the document)	
	52.	Curriculum Vitae of Dror Kopernik (to the extent	inadmissible, lack foundation,
17		deemed admissible by the Court, or for purposes of	is/are not genuine or
18		reference without the intent to admit the document)	authentic; constitute
10			inadmissible hearsay.
19	53.	Initial Expert Report of Dror Kopernik, dated	Constitutes inadmissible
•		August 2, 2021 (to the extent deemed admissible	hearsay.
20		by the Court, or for purposes of reference without	
21		the intent to admit the document)	
	54.	Curriculum Vitae of Stuart S. Kaplan, M.D.,	inadmissible, lack foundation,
22		FAANS (to the extent deemed admissible by the	is/are not genuine or
22		Court, or for purposes of reference without the	authentic; constitute
23		intent to admit the document)	inadmissible hearsay.
24	55.	Independent Medical Examination Report of Stuart	Constitutes inadmissible
		S. Kaplan, dated July 6, 2021(to the extent deemed	hearsay.
25		admissible by the Court, or for purposes of	
26	56	reference without the intent to admit the document) Supplemental Penart of Stuart S. Vanlan M.D.	Constitutes inadmissible
26	56.	Supplemental Report of Stuart S. Kaplan, M.D.,	Constitutes inadmissible
27		FAANS, dated August 2, 2021(to the extent deemed admissible by the Court, or for purposes of	hearsay.
		reference without the intent to admit the document)	
28		Supplemental Report of Stuart S. Kaplan, M.D.,	Constitutes inadmissible
	<u> </u>	Supplemental Report of Stuart S. Kapian, M.D.,	Constitutes madimissible

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1		FAANS, dated September 14, 2021(to the extent	hearsay.
		deemed admissible by the Court, or for purposes of	
2		reference without the intent to admit the document)	
3		Supplemental Report of Stuart S. Kaplan, M.D.,	Constitutes inadmissible
3		FAANS, dated December 7, 2021(to the extent	hearsay.
4		deemed admissible by the Court, or for purposes of	
		reference without the intent to admit the document)	
5	57.	Curriculum Vitae, Fee Schedule and Testimony	inadmissible, lack foundation,
4		History of Saman Hazany, M.D. (to the extent	is/are not genuine or
6		deemed admissible by the Court, or for purposes of	authentic; constitute
7		reference without the intent to admit the document)	inadmissible hearsay.
	58.	Expert Report of Saman Hazany, M.D. dated April	Constitutes inadmissible
8		26, 2022(to the extent deemed admissible by the	hearsay.
0		Court, or for purposes of reference without the	
9	50	intent to admit the document)	
10	59.	Deposition transcript of Michael Stevens with	
		exhibits (to the extent deemed admissible by the	
11		Court, or for purposes of reference without the	
12	60.	intent to admit the document)	
12	60.	Deposition transcript of Firooz Mashhood, M.D.	
13		with exhibits (to the extent deemed admissible by the Court, or for purposes of reference without the	
		intent to admit the document)	
14	61.	Deposition transcript of Ruth Quimby (volumes 1	
15	01.	and 2) with exhibits (to the extent deemed	
15		admissible by the Court, or for purposes of	
16		reference without the intent to admit the document)	
	62.	Deposition transcript of Maria Giacalone, D.C.	
17		with exhibits (to the extent deemed admissible by	
18		the Court, or for purposes of reference without the	
10		intent to admit the document)	
19	63.	Deposition transcript of Mouchir Harb, M.D. with	
		exhibits (to the extent deemed admissible by the	
20		Court, or for purposes of reference without the	
21		intent to admit the document)	
41	64.	Deposition transcript of Thomas L. Vater, D.O.,	
22		with exhibits (to the extent deemed admissible by	
		the Court, or for purposes of reference without the	
23		intent to admit the document)	
24	65.	Deposition transcript of Trooper Justin Branske	
4		with exhibits (to the extent deemed admissible by	
25		the Court, or for purposes of reference without the	
		intent to admit the document)	
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Defendant reserves the right to use any discovery responses and/or deposition testimony and/or deposition exhibits for impeachment and/or substantively as party admissions, as may be

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relevant at trial. Defendant reserves the right to use demonstrative evidence. Defendant also reserves the right to use any exhibit listed or introduced by Plaintiff, or as previously produced by the parties.

The parties reserve any all evidentiary objections for trial. The parties reserve the right to object to the admissibility of trial exhibits on the basis of foundation, authenticity, hearsay, and relevance. The parties further reserve the right to object to any exhibit being offered by each side which has not been previously produced during the normal course of discovery proceedings, or pursuant to stipulation and agreement of the parties. The parties also reserve any and all evidentiary objections for trial.

Electronic evidence: The parties intend to offer and present evidence in electronic format to jurors for purposes of jury deliberations pursuant to Local Rule 16-3(b)(9) and will contact the court administrator for instructions on how to prepare evidence in electronic format and for any other requirements set by the court.

Depositions: Defendant does not intend at this time to offer page and line designations for any deposition transcripts. In the event Defendant learns that a witness is unavailable to testify at trial, Defendant will notify all parties and the Court of page and line designations of the unavailable witness's deposition transcript to offer at trial. Defendant reserves the right to use all depositions which have been conducted in this action to refresh recollection and/or to impeach a witness, and otherwise use at trial in accordance with the applicable rules, *i.e.*, Fed. R. Civ. P. 32; Fed. R. Evid. 801(d).

The following witnesses may be called by the parties at trial:

No.: Plaintiff's Witnesses:

FACT & PERCIPIENT WITNESSES:

1. Ruth Quimby c/o THE702FIRM INJURY ATTORNEYS

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1		400 South 7th Street, 4 th Floor
2		Las Vegas, Nevada 89101 (702) 776-3333
3		
4	2.	Michael Stevens c/o HALL JAFFE & CLAYTON, LLP
		7425 Peak Drive
5		Las Vegas, NV 89128 (702) 316-4111
6		(702) 310 1111
7	3.	30(b)(6) Person(s) Most Knowledgeable and/or
8		Fed. R. Civ. P. 30(b)(6) for Pinnacle Heavy Haul, Inc., dba
		Pinnacle Transport Group
9		Pinnacle Transportation Systems, Inc.
10		c/o HALL JAFFE & CLAYTON, LLP 7425 Peak Drive
11		Las Vegas, NV 89128
		(702) 316-4111
12	4.	Officer Branske
13		Badge No. H6701
14		Nevada Highway Patrol
		4615 W. Sunset Road Las Vegas, NV 89118
15		
16	PLAINTIF	FF'S MEDICAL PROVIDERS - Fed. R. Civ. P. 30(B)(6) NTATIVES AND/OR DESIGNEES
17	KEIKESE	NIAIIVES AND/OR DESIGNEES
18	1.	Arron V. Lovinger, MD
		Treating Physicians and/or Treating Nurses and/or
19		Fed. R. Civ. P. 30(b)(6) Representative and/or
20		Custodian of Records
21		Fremont Emergency Services 2951 Marina Bay, Suite 130-132
		2731 Marina Bay, Suite 130-132
22	2.	Sunil Gujrathi, MD
23		Richard Schwartz, MD Joshua Owen, MD
24		Treating Physicians and/or
25		Treating Nurses and/or
25		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
26		Radiology Specialists, Ltd.
27		703 20 th Street
28		Columbus, GA 31902
IRM	3.	Alberto Achaval, D.C.

ĺ	П		
1		Treating Physicians and/or	
		Treating Nurses and/or	
2		Fed. R. Civ. P. 30(b)(6) Representative and/or	
3		Custodian of Records	
5		A&M Chiropractic Health Wellness Center	
4		830 E. Charleston Blvd.	
_		Las Vegas, NV 89104	
5	4.	Rogelio Machuca, MD	
6	4.	Treating Physicians and/or	
		Treating Nurses and/or	
7		Fed. R. Civ. P. 30(b)(6) Representative and/or	
8		Custodian of Records	
		Machuca Family Medicine	
9		1501 S. Eastern Avenue	
10		Las Vegas, NV 89104	
10	5.	Thomas Morgan EMT	
11	3.	Thomas Morgan, EMT Robert Norton, Paramedic	
12		Jon Flynn AEMT	
12		Treating Physicians and/or	
13		Treating Nurses and/or	
		Fed. R. Civ. P. 30(b)(6) Representative and/or	
14		Custodian of Records	
15		Community Ambulance	
		PO Box 98821	
16		Las Vegas, NV 89193	
17	6.	Rogelio Machuca, MD	
		Treating Physicians and/or	
18		Treating Nurses and/or	
19		Fed. R. Civ. P. 30(b)(6) Representative and/or	
		Custodian of Records	
20		Machuca Family Dispensary	
21		1501 S. Eastern Avenue	
21		Las Vegas, NV 89104	
22	7.	Bhuvana P. Kittusamy, MD	
23		Treating Physicians and/or	
23		Treating Nurses and/or	
24		Fed. R. Civ. P. 30(b)(6) Representative and/or	
25		Custodian of Records	
25		Las Vegas Radiology	
26		401 N. Buffalo Drive, Suite 100	
		Las Vegas, NV 89145	
27	8.	Aaron Lovinger, MD	
28	0.	Peggy L. Beller, MD	
		Treating Physicians and/or	
RM			

THE 702 FIRM
ATTORNEYS AT LAW
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PHONE: (702) 776-3333

ı	1	
1		Treating Nurses and/or
2		Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records Sunrise Hospital & Medical Center
3		3186 S. Maryland Parkway
4		Las Vegas, NV 89109
5	9.	Jorg Rosler, MD
6		Treating Physicians and/or Treating Nurses and/or
		Fed. R. Civ. P. 30(b)(6) Representative and/or
7		Custodian of Records
8		Interventional Pain & Spine Institute
9		851 S. Rampart Blvd., Suite 100 Las Vegas, NV 89145
10	10.	Melanie Gough, PT, and/or,
11	10.	Barbar Rosso, PT, and/or,
11		Doug Frasniewski, PT and/or,
12		Kasi Snook, PT and/or,
13		Treating Physicians and/or Treating Nurses and/or
		Fed. R. Civ. P. 30(b)(6) Representative and/or
14		Custodian of Records
15		New Century Rehabilitation (ATI Physical Therapy)
16		7301 Peak Dr, Ste. 150
		Las Vegas, NV 89128
17	11.	Fed. R. Civ. P. 30(b)(6) Representative and/or
18	11.	Treating Physicians and/or
19		Treating Nurses and/or
20		Custodian of Records PMSI Pharmacy
20		P.O. Box 850001, Dept. 0570
21		Orlando, FL 32885
22	12.	Firooz Mashhood, M.D. and/or
23	12.	Treating Physicians and/or
		Treating Nurses and/or
24		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
25		Medical Rehabilitation Associates
26		734 E. Sahara Ave.
		Las Vegas, NV 89104
27	13.	Fed. R. Civ. P. 30(b)(6) for
28		Professional Institute of Technology Inc
IRM	1	Treating Physicians and/or

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Ī		
1		Treating Nurses and/or
2		Representative and/or Custodian of Records
		2625 S. Rainbow Blvd
3		Las Vegas, NV 89104
4	14.	Kenneth Fortgang, M.D. and/or
5		Matthew Reardon, M.D and/or
6		Greg J. Coleman, PT and/or Michael P. Foster, PT and/or
7		Jason Rusk, M.D. and/or
		Steven Xiao, M.D. and/or Raymund Dela, M.D. and/or
8		John Britton, PT, and/or
9		Robert Lewis, PT and/or
10		Treating Physicians and/or Treating Nurses and/or
11		Fed. R. Civ. P. 30(b)(6) Representative and/or
12		Custodian of Records Concentra Medical Center
		149 N. Gibson Road
13		Henderson, NV 89014
14	15.	David Mirich, M.D. and/or
15		Henry Chang, M.D. and/or Treating Physicians and/or
16		Treating Nurses and/or
17		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
		Steinberg Diagnostic Medical Imaging
18		P.O. Box 36900 Las Vegas, NV 89133
19		Las Vegas, IVV 07133
20	16.	Eric Davis, M.S., CRC, and/or Treating Physicians and/or
21		Treating Nurses and/or
22		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
23		RVA-Rehabilitation & Vocational Associates
		6550 S. Pecos Rd. Ste B-114
24		Las Vegas, NV 89120
25	17.	George Greaney, MD Treating Physicians and/or
26		Treating Physicians and/or Treating Nurses and/or
27		Fed. R. Civ. P. 30(b)(6) Representative and/or
28		Custodian of Records Las Vegas Surgery Center
RM		870 S. Rancho

1	1		
1		Las Vegas, NV 89106	
2	18.	Joseph J. Schifini, MD	
3		Treating Physicians and/or Treating Nurses and/or	
4		Fed. R. Civ. P. 30(b)(6) Representative and/or	
5		Custodian of Records 600 S. Tonopah Dr., Suite 240	
6		Las Vegas, NV 89106	
	19.	Muhammad Ali Hyder, M.D. and/or	
7		Treating Physicians and/or	
8		Treating Nurses and/or Fed. R. Civ. P. 30(b)(6) Representative and/or	
9		Custodian of Records First Person Care Clinics	
10		1200 S. 4 th Street, Suite 111	
11		Las Vegas, NV 89104	
12	20.	Fed. R. Civ. P. 30(b)(6) Representative and/or	
13		Treating Physicians and/or Treating Nurses and/or	
14		Custodian of Records for	
15		QTC Medical Group 1818 N. Orange Grove, Suite 101	
16		Pomona, CA 91767	
	21.	Thomas Vater, DO, and/or	
17		Treating Physicians and/or Treating Nurses and/or	
18		Fed. R. Civ. P. 30(b)(6) Representative and/or	
19		Custodian of Records Nevada Orthopedic & Spine Center	
20		7455 W. Washington Ave. Ste. 160 Las Vegas, NV 89128	
21			
22	22.	Fed. R. Civ. P. 30(b)(6) Representative and/or Treating Physicians and/or	
23		Treating Nurses and/or	
24		Custodian of Records Oasis Counseling Neuropsychology/LCSW	
25		7361 Prairie Falcon Rd. Ste. D Las Vegas, NV 89128	
26			
	23.	Elizabeth Iole, M.D. and/or Treating Physicians and/or	
27		Treating Nurses and/or	
28		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records	
I IN IVI			

ĺ	Ì	
1		Quest Diagnostics
2		4230 Burnham Ave. #144 Las Vegas, NV 89119
3	24.	Fed. R. Civ. P. 30(b)(6) Representative and/or
4		Treating Physicians and/or
5		Treating Nurses and/or Custodian of Records
6		UNLV Medicine
7		1707 W. Charleston Blvd. Suite 110 Las Vegas, NV 891002
8	25.	Mouchir S. Harb M.D. and/or
9		Treating Physicians and/or Treating Nurses and/or
		Fed. R. Civ. P. 30(b)(6) Representative and/or
10		Custodian of Records Las Vages Neurosciones and Pain Institute
11		Las Vegas Neuroscience and Pain Institute 6276 S. Rainbow Blvd. Ste. 100
12		Las Vegas, NV 89118
13	26.	David K. Lieu, M.D and/or
14		Youssef Korkar, CLS and/or, Jesse A. Abrajano, M.S., CLS and/or
15		Treating Physicians and/or
16		Treating Nurses and/or Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records
17		Spectra Clinical Labs 8337 Telegraph Rd. #4
18		Pico Rivera, CA 90660
19	27.	Robert R. Cartwright, M.D. and/or
20		William Orrison, Jr. M.D. and/or
21		Treating Physicians and/or Treating Nurses and/or
22		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
23		SimonMed Imaging
24		P.O. Box 207465 Dallas, TX 75320-7466
25	20	
	28.	Parisa Amleshi, M.D. and/or Treating Physicians and/or
26		Treating Nurses and/or
27		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
28		Nevada Health Centers, Inc.
IRM		3325 Research Way

1		Carson City, NV 89706
2	29.	Stepanida Freeman, M.D. and/or
3		Treating Physicians and/or Treating Nurses and/or
4		Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records
5		Henderson Hospital 1050 W. Galleria Dr.
6	20	Henderson, NV 89011
7	30.	Marko Marbella, M.D. and/or Van Nguyen, M.D. and/or
8		Tamra Baldauf, M.D. and/or
9		Hubert Chin, M.D. and/or Treating Physicians and/or
		Treating Nurses and/or
10		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
11		Desert Radiology
12		2020 Palomino Lane, Ste 100
13		Las Vegas, NV 89106
14	31.	Soterita Aispuro, M.D. and/or
		Treating Physicians and/or Treating Nurses and/or
15		Fed. R. Civ. P. 30(b)(6) Representative and/or
16		Custodian of Records University Medical Center
17		1800 W. Charleston Blvd
18		Las Vegas, NV 89102
19	32.	Fed. R. Civ. P. 30(b)(6) Representative and/or
		Treating Physicians and/or Treating Nurses and/or
20		Custodian of Records
21		Kelly Hawkins & Associates
22		3831 W. Charleston Blvd Las Vegas, NV 89102
23	22	
24	33.	Treating Physicians and/or Treating Nurses and/or
25		Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records Firooz Mashhood, M.D.
26		5440 W Sahara Ave, Ste 104
27		Las Vegas, NV 89146
28		
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1	No.:	<u>Defe</u>	endant's Witnesses:
2		1.	Pinnacle Transport Group
3			A) FRCP 30(b)(6) Witness(es) to be determined
			B) Mark Herman, Director of Safety & Compliance 2206 Toledo Road
4			Elkhart, Indiana 46516
5			
6		2.	Michael L. Stevens 880 Salem Drive
			Toms River, New Jersey 08753
7			
8		3.	Ruth Quimby
9		٥.	c/o Michael C. Kane, Esq.
10			Bradley J. Myers, Esq.
10			Richard A. Englemann, Esq. THE702FIRM
11			400 South Seventh Street, Suite 400
12			Las Vegas, Nevada 89101
13		4.	Nevada Highway Patrol
14			A) FRCP 30(b)(6)Witness(es) and/or Custodian of Records
			B) Trooper Branske, P# H6701 4615 West Sunset Road
15			Las Vegas, Nevada 89118
16		~	
17		5.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Jeff Nicholls
			John Flynn
18			Community Ambulance
19			91 Corporate Park Drive, Suite 120 Henderson, Nevada 89074
20			110/14013011, 110 1444 05 07 1
21		6.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Laiken Dupes
			Fremont Emergency Services Mandavia, Ltd.
22			3429 Regal Drive
23			Alcoa, Tennessee 37701
24		7.	Physicians, Nurses, Technicians, Healthcare Providers and/or
25			FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Amanda Davis Jorg Rosler, M.D.
26			Interventional Pain and Spine Institute
			851 South Rampart Boulevard, Suite 100
27			Las Vegas, Nevada 89145
28		8.	Physicians, Nurses, Technicians, Healthcare Providers and/or
IRM			FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Mario Gonzalez

ı	1	
1		Bhuvana Kittusamy, M.D.
2		Las Vegas Radiology
2		401 North Buffalo Drive, Suite 100
3		Las Vegas, Nevada 89145
4	9.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Martha Felix
5		Rogelio Machuca, M.D. Maria Machuca, APRN
6		Machuca Family Medicine
7		1501 South Eastern Avenue Las Vegas, Nevada 89104
8		
9	10.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Andrea Araneta
10		Radiology Specialists, Ltd. 703 20 th Street
11		Columbus, Georgia 31902
12	11.	Physicians, Nurses, Technicians, Healthcare Providers and/or
		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Frances Oliveri
13		Aaron Lovinger, M.D.
14		Joshua Owen, M.D. Richard Schwartz, M.D
15		Sunrise Hospital
16		3186 South Maryland Parkway Las Vegas, Nevada 89109
16		Lus Vegus, Nevuda 65165
17	12.	Physicians, Nurses, Technicians, Healthcare Providers and/or
18		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Laurie Gove Joseph Schifini, M.D
19		Las Vegas Surgery Center
		870 South Rancho Drive
20		Las Vegas, Nevada 89106
21	13.	Physicians, Nurses, Technicians, Healthcare Providers and/or
22		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Ana Santamaria David Mirich, M.D
23		Henry Chang, M.D.
		Steinberg Diagnostic Medical Imaging
24		2950 South Maryland Parkway Las Vegas, Nevada 89109
25		
26	14.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Maria Santamaria
27		Alberto Achaval, D.C.
41		Maria Giacalone, D.C.
28		A&M Chiropractic
PM	1	228 South Jones Boulevard

i	I	
1		Las Vegas, Nevada 89107
2	15.	Physicians, Nurses, Technicians, Healthcare Providers and/or
3		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Clarence Kerr Quest Diagnostics
4		4230 Burnham Avenue Las Vegas, Nevada 89119
5	16	
6	16.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Anna Vardaman
7		Doug Krasniewski, PT Melanie Gough, PT
8		Kasi Snook, PT Barbara Rosso, PTA
9		New Century Rehabilitation, an ATI Company
10		1505 Wigwam Parkway, Suite 240 Henderson, Nevada 89074
11	17.	Physicians, Nurses, Technicians, Healthcare Providers and/or
12		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, "Erin" Spectra Clinical Labs
13		20655 South Western Avenue, Suite 105 Torrance, California 90501
14		
15	18.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Janine Schwartz
16		Thomas Vater, D.O. Vladimir Sinkov, M.D.
17		Nevada Orthopedic & Spine Center 7455 West Washington Avenue, Suite 160
18		Las Vegas, Nevada 89128
19	19.	Physicians, Nurses, Technicians, Healthcare Providers and/or
20		FRCP 30(b)(6)Witness(es) and/or Custodian of Records Mouchir Harb, M.D.
21		Las Vegas Neuroscience and Pain Medicine 6276 South Rainbow Boulevard, Suite 100
22		Las Vegas, Nevada 89118
23	20.	Physicians, Nurses, Technicians, Healthcare Providers and/or
24		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Jasmin Alicea PMSI Pharmacy
25		4502 East Woodland Corp Boulevard, Suite 105 Tampa, Florida 33614
26	21	
27	21.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Jasmin Alicea
28 RM		United States Postal Service Law Department - Western Area
IXIVI		

Í	İ	
1		1745 Stout Street, Suite 500
2		Denver, Colorado 80299-5555
3	22.	Physicians, Nurses, Technicians, Healthcare Providers and/or
		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Gerald Davis Gerald Y. Davis, M. Ed., CRC
4		Eric Davis, M.S., CRC
5		Rehabilitation & Vocational Associates 6550 South Pecos Road, Suite B-114
6		Las Vegas, Nevada 89120
7	23.	Physicians, Nurses, Technicians, Healthcare Providers and/or
8	23.	FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Roxie Franklin
9		Matthew Reardon, M.D. Tony Chin, M.D.
		Jason Rusk, PA-C
10		Raymund Dela, PA-C
11		John Britton, PT Greg Coleman, PT
12		Michael P. Foster, PT
		Concentra Medical Center
13		5850 South Polaris Avenue, Suite 100
14		Las Vegas, Nevada 89118
15	24.	Physicians, Nurses, Technicians, Healthcare Providers and/or
16		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Kevin Segoviano Firooz Mashhood, M.D.
		5440 West Sahara Avenue, Suite 104
17		Las Vegas, Nevada 89146
18	25.	Physicians, Nurses, Technicians, Healthcare Providers and/or
19		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Lisa Redden Stepanida Freeman, M.D.
20		Sean Stevens, M.D.
21		Henderson Hospital 1050 Galleria Drive
22		Henderson, Nevada 89011
	26.	Dror Kopernik, P.E.
23	20.	Foresight Reconstruction, Inc.
24		5901 Lincoln Avenue Morton Grove, Illinois 60053
25		Morton Grove, minors 60055
26	27.	Whitney G. Morgan Motor Carrier Safety Consulting
27		2229 First Avenue North
		Birmingham, Alabama 35203
28	28.	Stuart S. Kaplan, M.D.
IRM		1 /

Las Vegas Neurosurgical Institute 1 3012 South Durango Drive 2 Las Vegas, Nevada 89117 3 29. Saman Hazany, M.D. 2800 Neilson Way, Suite 1704 4 Santa Monica, California 90405 5 The parties agree that the witness and exhibit list may be amended as required before trial. 6 The parties reserve the right to use any witnesses listed by any other party to this litigation. 7 The parties further reserve the right to name and list any witnesses deemed necessary for rebuttal 8 9 and/or impeachment purposes. 10 VIII. TRIAL DATE 11 Counsel have met and herewith submit a list of (3) agreed-upon trial dates: 12 May 8, 2023 13 May 15, 2023 14 May 23, 2023 15 It is expressly understood by the undersigned that the Court will set a trial of this matter on 16 **17** one of the agreed-upon dates if possible; if not, the trial will be set at the convenience of the 18 Court's calendar. 19 ESTIMATED LENGTH OF TRIAL 20 It is estimated that the trial will take a total of 7-10 days. 21 22 23 24 25 26 27 28

1	THE702FIRM INJURY ATTORNEYS	HALL TARRE & CLAVIDON LLD			
1	THE/02FIRM INJURY ATTORNETS	HALL JAFFE & CLAYTON, LLP.			
2	/s/ Zachary W. Livingston	/s/ Daniel C. Tetreault			
3	MICHAEL C. KANE. ESQ. 5/17/2022	5/17/2022 STEVEN T. JAFFE, ESQ.			
4	Nevada Bar No.: 10096	Nevada Bar No.: 7035			
7	BRADLEY J. MYERS, ESQ.	DANIEL C. TETREAULT, ESQ.			
5	Nevada Bar No.: 8857	Nevada Bar No.: 11473			
6	ZACHARY W. LIVINGSTON, ESQ.	7425 Peak Drive			
	Nevada Bar No.: 15954 400 S. 7 th Street, 4 th Floor	Las Vegas, Nevada 89128 Telephone: (702) 316-4111			
7	Las Vegas, Nevada 89101	Facsimile: (702) 316-4114			
8	Telephone: (702) 776-3333	E-Mail: sjaffe@lawhjc.com			
O	Facsimile: (702) 505-9787	E-Mail: dtetreault@lawhjc.com			
9	E-Mail: <u>service@the702firm.com</u>	Attorneys for Defendants			
10	Attorneys for Plaintiff				
10					
11					
12					
	ACT	ION BY THE COURT			
13	ACTION BY THE COURT				
14		y trial on the fixed/stacked calendar on May 8, 2023			
15	at 9:00 a.m.				
13					
16	The Calendar call will be held on May 3, 2023 at 1:30 p.m				
17		•			
	This pretrial order has been approved by	by the parties to this action as evidenced by their			
18					
19	signatures or the signatures of their attorneys hereon, and the order is hereby entered and will				
20	govern the trial of this case. This order may not be amended except by court order and based upon				
21	the parties' agreement or to prevent manifest injustice.				
22	DATED: May 23, 2022				
23		Xellus C. Mahan			
		INITED STATES DISTRICT JUDGE			
24		THE STATES DISTRICT TODGE			
25					
26					
27					
28					